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ANY OTHER BUSINESS

Considerations to improve the safety of pilot transfer arrangements

Submitted by China

SUMMARY

Executive summary: This document presents information on preliminary considerations on issues relating to pilot transfer arrangements

Strategic direction, if applicable: 6

Output: Not applicable

Action to be taken: Paragraph 16

Related documents: Resolutions A.158(ES. IV); A.1045(27) and MSC.308(88); MSC.1/Circ.1331, MSC.1/Circ.1428; NCSR 6/INF.10 and NCSR 7/INF.17

Introduction

1 Since seafaring began, pilots with specialized knowledge have helped guide vessels safely into or out of ports, especially where navigation is hazardous and the shipmaster is unfamiliar with the area. The importance of employing qualified pilots in approaches to ports and other areas where specialized local knowledge is required was formally recognized by IMO in 1968, when the Organization adopted an Assembly resolution on pilotage (resolution A.158(ES.IV)).

2 While pilots are indispensable to the safe and efficient movement of seagoing vessels, boarding and disembarking of vessels at sea remains a perilous activity undertaken by maritime pilots around the world. To improve the safety of pilots, the Organization adopted resolution MSC.308(88) on amendments to SOLAS regulation V/23 in 2010 and resolution A.1045(27) on recommendation on pilot transfer arrangements in 2011. Despite the inspection requirements imposed under SOLAS regulation V/23 and the minimum standards on the arrangement of pilot ladders set out in resolution A.1045(27), we regret to see accidents involving the tragic loss of pilots continue to happen as a result of non-compliant pilot transfer arrangements.

3 At NCSR 7 in January 2020, the observer from the International Maritime Pilots' Association (IMPA) raised the specific issue concerning trapdoor in the platform of the accommodation ladder, which killed Captain Denis Sherwood, a New York pilot, as it is not in compliance with current SOLAS requirements. These unsafe trapdoor accidents have also been experienced and reported in China.

4 Besides, in accordance with SOLAS regulation V/23.2.3, a pilot ladder shall be certified by the manufacturer as complying with this regulation or with an international standard acceptable to the Organization. The latter refer to the recommendations by the International Organization for Standardization (ISO), in particular ISO 799:2019. It is noted that a discrepancy exists between the standard contained in the updated ISO 799:2019 and that developed by IMO, which needs to be clarified and harmonized.

5 In this context, China conducted a preliminary analysis on issues relating to the safety of pilot transfer arrangements as outlined below.

Maintenance and inspection of pilot transfer arrangements

6 As reported by IMPA in 2018, 2019 and 2020, the average rate of non-compliant pilot transfer arrangements of all ship types can be as high as 14.3%. On the other hand, statistics from Tokyo MOU between 2015 and 2017 show that the number of ships identified with pilot transfer arrangements related deficiencies only accounts for about 0.25% of all ships inspected and the number of pilot transfer arrangements related deficiencies accounts for around 0.38% of all deficiencies identified.

7 Unsafe and improper use of pilot ladders, as well as a lack of regular and effective maintenance and inspection, are found to be major contributing factors to such a high non-compliance rate of pilot transfer arrangements. Pilot transfer arrangements, in particular pilot ladders, are susceptible to damage and deformation due to its frequent usage, and unsafe and improper use of pilot ladders on board accelerate their deterioration with an increasing level of safety risks. Moreover, seafarers are likely to neglect pilot ladders during their daily maintenance, as pilot ladders are usually stowed when unused, and port State control officers (PSCOs), due to time limit, would often concentrate more on bridge navigation equipment, engine equipment, fire-fighting and life-saving equipment. As a result, non-compliant pilot transfer arrangements would not be identified or rectified timely and consequently pose huge risks to the safety of pilots, often resulting in severe injuries or loss of lives.

8 Although SOLAS regulation V/23.2.1 requires that the appliances shall be kept clean, properly maintained and stowed, and shall be regularly inspected to ensure that they are safe to use, there has been no significant improvement in the safety of pilot ladders. It is noted that there are detailed maintenance and inspection requirements for life-saving appliances and specific guidance on the construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation such as accommodation ladders and gangways (MSC.1/Circ.1331). For pilot ladders, which are as important to pilots and other personnel embarking and disembarking vessels as life-saving and fire-fighting appliances to seafarers, much more needs to be done.

9 In this respect, China considers it necessary that:

- .1 maintenance and inspection requirements be included in SOLAS regulation V/23, similar to those relating to life-saving appliances under SOLAS regulation III/20, and all inspections, maintenance work and repairs of pilot transfer arrangements be recorded;

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- .2 training on safe use of pilot transfer arrangements for seafarers be strengthened, and best practices or guidance in this regard be developed, if necessary;
 - .3 Concentrated Inspection Campaign (CIC) on pilot transfer arrangements be carried out worldwide to improve the enforcement of IMO standards; and
 - .4 information exchange and cooperation between PSC and pilotage authorities be strengthened.

Trapdoor

10 In accordance with SOLAS regulation V/23.3.3.2, when a combination arrangement using an accommodation ladder with a trapdoor in the bottom platform is used, the pilot ladder and manropes shall be rigged through the trapdoor extending above the platform to the height of the handrail. In addition, means shall be provided to secure the lower platform of the accommodation ladder to the ship's side, so as to ensure that the lower end of the accommodation ladder and the lower platform are held firmly against the ship's side. Similarly, paragraph 3.7 of resolution A.1045(27) provides that when a trapdoor is used in a combination arrangement, the pilot ladder should extend above the lower platform to the height of the handrail and remain in alignment with and against the ship's side.

11 The purpose of the above requirements is to bring the ladder steps up to a level from which the pilot can step across to the platform rather than pull himself or herself up to it. In practice, however, pilots continue to experience non-compliant and unsafe trapdoor arrangements and they have great difficulty in hoisting themselves up through the trapdoor. Besides, it is reported by pilots that the aperture of the trapdoor may be difficult for some pilots to pass through, particularly in winter when they have heavy cloths and bags on.

12 Considering the above, it is beneficial that:

- .1 a sketch of a trapdoor be incorporated into the poster of required boarding arrangements for pilots circulated through MSC.1/Circ.1428, with a view to assisting its correct design, installation and use; and
- .2 the size of aperture be reconsidered to make it more appropriate for pilots under all circumstances.

Size of side ropes and handhold

13 Resolution A.1045(27) specifies that the side ropes should be not less than 18 mm in diameter (paragraph 2.2.1) and the handhold should be not less than 32 mm in diameter (paragraphs 5.1 and 5.2). There is no upper limit for the diameter of side ropes or handhold and pilots report that there have been cases where the diameter of side ropes or handhold are too big to hold by hand. Therefore, an upper limit for side ropes and handhold is needed, similar to manropes.

Supervision during disembarkation

14 SOLAS regulation V/23.2.2 stipulates that "the rigging of the pilot transfer arrangements and the embarkation of a pilot shall be supervised by a responsible officer having means of communication with the navigation bridge". Considering that a pilot may face the same risks during disembarkation as embarkation, it is necessary for a responsible officer having means of communication with the navigation bridge to supervise the disembarkation of

a pilot. Thus, requirements relating to supervision during disembarkation should be added to SOLAS regulation V/23.2.2 as follows: "the rigging of the pilot transfer arrangements, and the embarkation and disembarkation of a pilot shall be supervised by a responsible officer having means of communication with the navigation bridge".

Inconsistency between IMO and ISO standards

15 In accordance with SOLAS regulation V/23.2.3, a pilot ladder shall be certified by the manufacturer as complying with this regulation or with ISO 799:2019. Resolution A.1045(27), paragraph 2.2.3 provides that "each pair of side ropes should be secured together both above and below each step with a mechanical clamping device properly designed for this purpose, or seizing method with step fixtures (chocks or widgets)", while in ISO 799:2019, mechanical clamping device is deleted, as compared to ISO 799:2004. The inconsistency between IMO and ISO standards concerning the use of mechanical clamping device may cause confusion during implementation and need to be clarified, with a view to achieving harmonized and safe standards worldwide.

Action requested of the Sub-Committee

16 The Sub-Committee is invited to note the information provided above.